

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lane Plating Works - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #4
Progress - Removal Action
Lane Plating Works
A6MS
Dallas, TX

To: Reggie Cheatham, EPA
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From: Mark Hayes, FOSC

Date: 11/22/2016

Reporting Period: 14 November - 18 November 2016

1. Introduction

1.1 Background

Site Number:	A6MS	Contract Number:	EP-W-06-042
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/14/2016	Start Date:	11/14/2016
Demob Date:	11/18/2016	Completion Date:	11/18/2016
CERCLIS ID:	TXN000605240	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

1.1.2.1 Location

The site is located in Dallas, Dallas County, Texas (32.6878557°N latitude, - 96.7692897° W longitude) within a commercial/residential area. The site encompasses approximately 4.655 acres according to the Dallas County Appraisal District.

A barbed wire fence and locked chain-link fence surrounds the property, and the building is locked with the windows boarded up; there is no access except by key at the locked gate. Site topography and surface water drainage appears to slope to the south-southeast.

1.1.2.2 Description of Threat

Lane Plating is an abandoned electroplating facility that contained an unknown number of drums, tanks and vats containing electroplating wastes that ceased operations in 2015. After filing bankruptcy in late 2015, Lane Plating is now controlled by Stag Management, Inc. a court-appointed trustee. Electroplating process wastes include acids, bases, flammables, oxidizers, chromium-containing solids (sludge), and liquids, and Resources Conservation Recovery Act (RCRA) nonhazardous solids and liquids.

The site presents concerns in regards to public health and the environment. Based on the site history and site conditions. The chemicals utilized in the electroplating process contain hazardous substances, contaminants and/or pollutants that potentially have impacted on-site soils. The contaminants of concern for the site are, but not limited to, cyanides, chromium, cadmium, lead and other hazardous substances associated with electroplating the plating process.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On 4 November 2015, the Texas Commission on Environmental Quality (TCEQ) conducted a preliminary investigation of the site.

On 19 November 2015, TCEQ representatives met with their Emergency Response Contractor (SWS) at the site to develop a scope of work/work-plan to provide site security to prevent unauthorized access to the building, to provide haz-cat analysis and chemical characterization of chemicals in the onsite lab as well as re-packaging of select chemicals for disposal. On 1 December 2015, SWS personnel mobilized to the site to stage poly totes for storing chromic acid wastes to be removed from the two main sump areas located in the facility.

On 3 December 2015, SWS personnel mobilized to the site to initiate the removal of chromic acid wastes

from the two sumps and to conduct the haz-cat identification, lab-pack and over – packing of select chemicals at the site. The wastes were pumped into 300 gallon poly totes staged adjacent to the sump/chrome tank and at the east loading dock. All chemical contents in the containers in the lab were identified and labeled for future disposal. The removal of the chromic acid from the main sump and the sump beneath the tank was continued and completed on 7 December 2015.

On 18 December 2015, six containers of cyanide containing materials were transported for disposal at the Chemical Reclamation Services Facility.

On 17 March 2016, TCEQ contacted EPA requesting EPA assistance with the removal assessment.

On 12 April 2016, composite five-point soil sampling activities were conducted within thirty-seven 50 by 50 foot grids along the exterior of the facility by the EPA Team. Within each grid, sample aliquots were collected from each corner and from the center of the grid at a depth of 0 to 6 inches below ground surface (bgs). The aliquots were then combined and containerized as a composite sample.

On 13 April 2016, five biased grab soil samples were collected by the EPA Team in areas previously identified by TCEQ to have elevated concentrations of lead and chromium along the southeastern part of the site. In addition to the soil samples collected, three aqueous waste samples plus a duplicate and MS/MSD were collected using coliwasa tube samplers from within the building. Two samples were taken from the 300 gallon totes containing chromic acid waste from each of the two sumps and the other sample was taken from a tank labeled "Rinse Water Tank".

A total of 36 soil samples and 4 liquid waste samples were collected by the EPA Team to determine the nature and extent of site-related, hazardous constituents associated with electroplating waste (plating waste) in on-site soils, and to verify if liquids, contained in an unknown number of drums and totes, were considered hazardous substances. Soil samples were submitted for analysis of Metals and Hexavalent Chromium [Cr (VI)]. Liquid waste samples were submitted for analysis of Metals, Hexavalent Chromium [Cr (VI)], Corrosivity (pH), and Sulfide and Cyanide Reactivity. Soil analytical data was compared to the EPA Regional Screening Levels (RSLs), Industrial Soil (THQ = 1.0), May 2016. The liquid waste characterization results were compared to 40 CFR Part 261.

Based on the analytical results, hexavalent chromium, lead, and mercury contaminated soil was present around the footprint of the building. Hexavalent chromium was reported in 17 grids exceeding the EPA RSL of 6.3 mg/Kg. Hexavalent chromium contaminated soil ranged in concentration from 167 mg/Kg (Grid E7) to 5,620 mg/Kg (Grid G7). Lead exceeded the EPARSL of 800 mg/Kg in six grids. Mercury was observed above instrument detection limits in several grids but only exceeded in one grid above the EPA RSL of 46 mg/Kg.

Four liquid waste samples were collected from two on-site totes and one tank labeled as "Rinse Water Tank" and analyzed to confirm the presence of hazardous substances. Based on the laboratory results, the liquid waste by definition is hazardous due to the characteristic of corrosivity with a pH less than 2. Concentrations ranged from 0.6 to 2.15. Total chromium present in the liquid samples ranged from 105,000 mg/Kg to 296,000 mg/Kg.

On 19 September 2016, the EPA Team returned to the site to conduct additional sampling (Phase II) to further characterize the property and to further determine the nature and extent of site-related hazardous constituents associated with electroplating waste (plating waste) in on-site soils.

From 20 September through 23 September 2016, the EPA Team collected composite five-point soil samples from within approximately 72 grids. Samples were collected at three depth intervals: 0 to 6 inches below ground surface (bgs), 6 to 12 inches bgs, and 12 to 18 inches bgs. Soil samples were submitted for analysis of Metals and Hexavalent Chromium [Cr (VI)]. A total 216 samples (192 normal, 20 duplicate, and 4 equipment) were collected during this sampling event. Samples collected at the 6 to 12 inch interval were placed on hold pending analytical results from the 0 to 6 inch and 12 to 18 inch interval.

Based on the analytical results, hexavalent chromium, lead, and mercury contaminated soil was present around the footprint of the building. Hexavalent chromium was reported in three grids exceeding the EPA RSL of 6.3 mg/Kg. Hexavalent chromium contaminated soil ranged in concentration from 9.69 mg/Kg (Grid H4 at a depth of 18 inches) to 203 mg/Kg (Grid E6 at a depth of 6 inches). Lead exceeded the EPA RSL of 800 mg/Kg in one grid at a concentration of 3740 mg/Kg (E6 at a depth of 6 inches). Mercury was reported in two grids exceeding the EPA RSL of 46 mg/Kg, ranging from 46.2 mg/Kg (I10 at a depth of 6 inches) to 77.8 mg/Kg (E6 at a depth of 6 inches).

Due to analytical results that exceeded EPA RSLs, the laboratory was instructed by the EPA Team to analyze the 6 to 12 inch interval for grids C2, D2, D6, E6, D7, F1, F7, G5, G7, and I10.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On 3 October 2016, the EPA Team returned to the site to begin waste characterization of liquid waste found in various totes, drums, and buckets within the facility, and to consolidate remaining liquid waste into appropriate containers. From 4 October through 18 October 2016, ERRS contractors conducted the haz-cat identification of approximately 153 containers. Drums and containers were grouped by waste streams and compatibility for future transport and disposal at an authorized facility. In addition to consolidating waste streams, vats and sumps were pumped of their contents and transferred into compatible containers. Waste stream inventory included the following:

- Cyanide (CN) Solution
 - o 23 x 55 gallon drums
 - o 1 x 275 gallon tote
- Cyanide (CN) Solids
 - o 2 x 55 gallon drums

- Acid/Oxidizer (chromic acid)
 - o 21 x 55 gallon drums
 - o 39 x 275 gallon totes
 - o 1 x 330 gallon tote
- Acid/Oxidizer sludges (chromic acid sludges and solids)
 - o 22 x 55 gallon drums
 - o 1 x 95 gallon overpack
 - o 1 x cubic yard box (bricks from vat bottom)
- Sulfuric Acid
 - o 2 x 55 gallon drums
 - o 9 x 30 gallon drums
- Flammable Paint
 - o 2 x 55 gallon drum loose pack
- Latex paint
 - o 2 x 55 gallon drum loose pack
- Flammable Aerosol
 - o 2 x 5 gallon pails
- Acid Solids
 - o 2 x 55 gallon drums
- Acid Liquids
 - o 4 x 55 gallon drums
- Neutral Liquids
 - o 1 x 275 gallon tote
 - o 9 x 55 gallon drums
- Neutral Solids
 - o 2 x cubic yard boxes
- Elemental Mercury
 - o 1 x 5 gallon pail
- Waste Oil
 - o 2 x 55 gallon steel drums
 - o 1 x 330 gallon tote
- Waste Oil Filters
 - o 1 x 55 gal steel drum
- Flammable Liquids
 - o 1 x 55 gallon steel drum
- Caustic Solids
 - o 4 x 55 gallon drums
 - o 1 x cubic yard box
- Caustic Liquids
 - o 12 x 55 gallon drums
 - o 1 x 30 gallon drum (ammonia hydroxide)
- Soil
 - o 12 x cubic yard bulk bags
 - o 2 x 55 gallon drums

From 14 October through 18 October 2016, the EPA Team returned to the site to remove waste containers for transportation at an authorized facility for final disposal.

- 16 November 2016
 - o Manifest 009776314 – Clean Harbors Deer Trail Landfill, Deer Trail, CO
 - § RQ, UN1755, Waste Chromic acid solution - 15 Portable Tanks (TP)

17 November 2016

- o Manifest 009776315 – Clean Harbors Deer Trail Landfill, Deer Trail, CO
 - § RQ, UN1755, Waste Chromic acid solution – 14 Portable Tanks (TP)
 - § RQ, UN1755, Waste Chromic acid solution – 3 Fiber/Plastic Drums (DF)
- o Manifest 009776316 – Clean Harbors Deer Trail Landfill, Deer Trail, CO
 - § RQ, UN1755, Waste Chromic acid solution – 11 Portable Tanks (TP)
 - § UN3077, Waste Solid N.O.S. (contaminated soil) – 5 Burlap Sack (BA)

17 November 2016

- o Manifest 009776313 – Clean Harbors Deer Trail Landfill, Deer Trail, CO
 - § UN3077, Waste Solid N.O.S. (contaminated soil) – 7 Burlap Sack (BA)
 - § UN3082, Waste Liquid N.O.S. (Cadmium/Chromium) – 1 Portable Tanks (TP)
 - § UN3077, Waste Solid N.O.S. (Chromium) – 9 CF
 - § UN3077, Waste Solid N.O.S. (Contaminated Soil) – 2 Fiber/Plastic Drums (DF)
 - § UN3262, Waste Corrosive Solid, Basic (Sodium Hydroxide) – 1 Fiber/Plastic Box (CF)

17 November 2016

- o Manifest 009776310 – Veolia ES Technical Solution, Henderson, CO
 - § UN3506, Waste Mercury – 1 Fiber/Plastic Drum (DF)
- o Manifest 009776307 – Clean Harbors Deer Trail Landfill, Deer Trail, CO
 - § UN3260, Waste Corrosive Solid, Acidic, N.O.S. (Sulfuric Acid/Cadmium) – 2 Fiber/Plastic Drums (DF)
 - § UN3262, Waste Corrosive Solid, Basic, N.O.S. (Sodium Hydroxide/Cadmium) – 4 Fiber/Plastic Drums (DF)
 - § UN3264, Waste Corrosive Liquid, Acidic (Hydrochloric Acid, Sulfuric Acid) – 4 Fiber/Plastic Drums (DF)
 - § UN3082, Waste Liquid, N.O.S. (Cadmium/Chromium) – 9 Fiber/Plastic Drums (DF)
 - § UN3082, Waste Liquid, N.O.S. (Cadmium/Chromium) – 1 Fiber/Plastic Drums (DF)
 - § UN1755, Waste Chromic Acid Solution – 18 Fiber/Plastic Drums (DF)
 - § UN1755, Waste Chromic Acid Solution – 22 Fiber/Plastic Drums (DF)
 - § UN1755, Waste Chromic Acid Solution – 1 Fiber/Plastic Drums (DF)
 - § UN1830, Waste Sulfuric Acid – 9 Fiber/Plastic Drums (DF)
 - § UN1830, Waste Sulfuric Acid – 2 Fiber/Plastic Drums (DF)
 - § Non-RCRA hazardous Waste Solid (Oil Filters) – 1 Fiber/Plastic Drums (DF)
 - § UN3260 Waste Corrosive Solid, Acidic (Chromic Acid) – 2 Fiber/Plastic Box (CF)

18 November 2016

- o Manifest 009776312 – Clean Harbors La Porte, La Porte, TX
 - § UN1001, Acetylene, Dissolved – 1 Cylinder (CY)
- o Manifest 009776308 – Clean Harbors Environmental Services, Kimball, NE
 - § UN1993, Waste Flammable Liquids, N.O.S. (Methyl Ethyl Ketone) – 1 Metal Drum (DM)
 - § UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide) – 12 Fiber/Plastic Drums (DF)
 - § UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide) – 1 Fiber/Plastic Drums (DF)
 - § UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide) – 23 Fiber/Plastic Drums (DF)
- o Manifest 009776309 – Clean Harbors Spring Grove Resource Recovery, Cincinnati, OH
 - § UN1993, Waste flammable Liquids, N.O.S. (Methyl Ethyl Ketone) – 2 Metal Drum (DM)
 - § UN1993, Waste flammable Liquids, N.O.S. (Methyl Ethyl Ketone) – 1 Metal Drum (DM)
- o Manifest 009776110 – Clean Harbor Deer Trail Landfill, Deer Trail, CO
 - § UN3077, Waste Solid, N.O.S. (Silver) – 2 Fiber/Plastic Box (CF)
- o Non-Hazardous Waste Manifest – Twin Enviro Services Phantom Landfill, Penrose, CO
 - § Non-Hazardous Liquid (Latex Paint) – 2 Fiber/Plastic Drums (DF)

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

- Continue to conduct data validation on samples submitted for analysis.
- Complete Removal Assessment Reports

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

19 September 2016

- START – 1
- Driller – 1
- Utility Locate – 1

20 September 2016

- EPA OSC – 1
- START – 3
- Driller – 2

21 September 2016

- EPA OSC – 1
- START – 3
- Driller – 2

22 September 2016

- EPA OSC – 1
- START – 3
- Driller – 2

23 September 2016

- EPA OSC – 1
- START – 3
- Driller – 2

4 October 2016

- EPA OSC – 2
- START – 1
- Response Manager – 1
- ERRS – 3

5 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1

- Machine Operator – 1
- Accountant – 1

6 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

7 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

8 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

9 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

10 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

11 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

12 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

13 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

14 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

15 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

16 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

17 October 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 3
- Chemist – 1
- Machine Operator – 1
- Accountant – 1

14 November 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 2
- Machine Operator – 1

15 November 2016

- EPA OSC – 1
- START – 1
- Response Manager – 1
- ERRS – 2
- Machine Operator – 1

16 November 2016

- EPA OSC – 2
- START – 1
- Response Manager – 1
- ERRS – 2
- Machine Operator – 1

17 November 2016

- EPA OSC – 2
- START – 1
- Response Manager – 1
- ERRS – 2
- Machine Operator – 1

18 November 2016

- EPA OSC – 2
- START – 1
- Response Manager – 1
- ERRS – 2
- Machine Operator – 1

5. Definition of Terms

- BA – Burlap, cloth, paper, or plastic bags
- bbls – barrels
- CF - Fiber or plastic boxes, cartons, cases
- CM - Metal boxes, cartons, cases (including roll-offs)
- CY – Cylinders
- DF - Fiberboard or plastic drums, barrels, kegs
- DM - Metal drums, barrels, kegs
- EPA – Environmental Protection Agency
- ERRS – Emergency and Rapid Response Services

- LRV – Logistics Response Vehicle
- NOI - Notice of Federal Interest
- N.O.S. – Not Otherwise Specified
- OSC – On-Scene Coordinator
- PRP – Potentially Responsible Parties
- START – Superfund Technical Assessment and Response Team
- TCEQ - Texas Commission on Environmental Quality

y³ – cubic yard

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/laneplating

6.2 Reporting Schedule

7. Situational Reference Materials

For additional information, please refer to “Documents” on www.epaosc.org/laneplating.